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EX PARTE

April 26, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112; Petition of The Verizon Local and Long Distance Telephone Companies for Forbearance under 47 U.S.C. § 160(c) with Regard to Certain Dominant Carrier Regulations for In-Region, Interexchange Services, WC Docket No. 06-56

Dear Ms. Dortch

This letter responds to a request from staff to update the record concerning Verizon's provision of international services and its affiliation with foreign carriers.

First, Verizon clarifies that various Verizon International 214 Licensees that are Section 272 affiliates² provide international interexchange telecommunications services to business and residential customers located in the former Bell Atlantic's "in-region" service areas.³ The Verizon International 214 Licensees also comply with the

¹ The Verizon companies participating in the referenced matters ("Verizon") are the local exchange and long distance carriers affiliated with Verizon Communications Inc.

² The Verizon International 214 Licensees are the subsidiaries of Verizon Communications Inc. holding international Section 214 authorizations listed on Attachment A.

³ In addition, Verizon New England Inc., d/b/a Verizon Maine, provides service between Verizon Maine's Lubec exchange, located in Maine, and the Campobello Island exchange of New Brunswick Telecommunications, located in New Brunswick, Canada, to comply with an order of the Maine Public Utility Commission directing Verizon Maine to implement local calling on a non-optional, flat-rate basis from its Lubec exchange to the Campobello Island exchange. *See* Public Notice: International Authorizations Granted, DA 03-3021, rel. Oct. 2, 2003 at 1; *Verizon Petition for Limited Modification of a LATA Boundary to Provide Expanded Local Calling Service (ELCS)*, WC Docket No. 02-328, Memorandum Opinion and Order (rel. Sept. 26, 2003).

independent LEC separation rules⁴ and provide international interexchange telecommunications services to business and residential customers located in the former GTE's service areas. The data that Verizon has provided in this proceeding demonstrates clearly that Verizon is not dominant in the provision of international telecommunications **services**, just as it is not dominant in the provision of other interstate telecommunications services.

Second, Verizon is affiliated with a number of foreign carriers as those terms are defined by the Commission's **rules**.⁵ At present, the Verizon International 214 Licensees are classified as dominant on the U.S.-Dominican Republic, U.S.-Gibraltar, and U.S.-Venezuela routes. This classification was imposed pursuant to section 63.10(a)(2) of the Commission's **rules**, 47 C.F.R. § 63.10(a)(2), because Verizon's affiliates in the Dominican Republic, Gibraltar, and Venezuela were deemed by the Commission to have market power in those **countries**.⁶ The Verizon International 214 Licensees are classified as nondominant on all other routes.'

On December 1, 2006, Verizon Communications Inc. completed the sale of its 100% interest in Verizon Dominicana to América Móvil.⁸ The Verizon International 214 Licensees have filed an application to modify their regulatory classification from

⁴ 47 C.F.R. §§ 64.1901-64.1903.

⁵ 47 C.F.R. § 63.09(d), (e).

⁶ The Commission classified the Verizon International 214 Licensees as dominant on the U.S.-Dominican Republic, U.S.-Gibraltar, and U.S.-Venezuela routes in the following orders: *GTE Telecom Incorporated: Application for Authority Pursuant to Section 214 of the Communications Act to provide International Switched Resale, Facilities-Based Switched, Private Line Voice and Data Services and Resold Non-interconnected Private Lines to Venezuela and the Dominican Republic*; *GTE Mobilnet Incorporated, on Behalf of Itself and Certain of its Corporate Affiliates: Application for Authorization Pursuant to Section 214 of the Communications Act to Operate as an International Resale Carrier for International Switched Voice Services to the Dominican Republic and Venezuela*, Order Authorization, and Certificate, 13 FCC Rcd 4378 (1998) (¶ 46); *GTE Corporation, Transferor and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, Memorandum Opinion and Order, 15 FCC Rcd 14032 (2000) (¶ 422); *Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, FCC 05-184 (2005) (¶ 225).

⁷ See *id.*

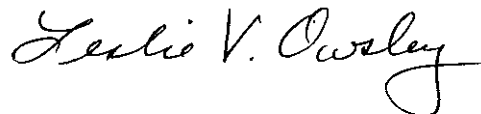
⁸ See News Release, "Verizon Communications Completes the Sale of Its Interest in Verizon Dominicana" (Dec. 1, 2006) (available at <http://investor.verizon.com/news/view.aspx?NewsID=789>).

dominant to nondominant on the U.S.-Dominican Republic route. On February 12, 2007, Verizon Communications agreed with the Bolivarian Republic of Venezuela that, subject to certain conditions, it will sell its interest in CANTV to the Republic by participating in tender offers to be conducted by the Republic in the United States and Venezuela. On April 23, 2007, Verizon completed the sale of its entire interest in Gibtelecom (50%) to Telekom Slovenije. The Verizon International 214 Licensees expect to seek reclassification as nondominant on the U.S.-Gibraltar and U.S.-Venezuela routes in the near future.

The regulatory classification of the Verizon International 214 Licensees with respect to the provision of international telecommunications services on the Dominican Republic, Gibraltar, and Venezuela routes is independent of Verizon's classification with respect to the provision of domestic interstate communications, and should not change solely because Verizon ceases to operate its present Section 272 affiliates in full compliance with Section **272** of the Act or integrates those affiliates into the operating companies.

If you have any questions, please do not hesitate to call me.

Very truly yours,

A handwritten signature in black ink, reading "Leslie V. Owsley". The signature is fluid and cursive, with a long horizontal stroke at the end.

Leslie V. Owsley

cc: William Dever
William Kehoe
Pamela Megna

Attachment A

The following Verizon subsidiaries holding International Section 214 authorizations are Section 272 affiliates:

- Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance
- NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions
- Verizon Select Services Inc.
- Verizon Airfone Inc.
- Verizon International Communications Services Inc.
- MCI International, Inc.
- MCI Communications Services, Inc.
- MCI International Services, Inc.

The following Verizon subsidiaries hold International Section 214 authorizations but are not "Section 272" affiliates because they do not provide IAT services in the former Bell Atlantic "in-region" service areas:

- MCI, LLC
- MCI Communications Corporation
- MFS Globenet, Inc.
- Verizon Hawaii International Inc.